

EXHIBIT A

STATE OF INDIANA) IN THE MARION COUNTY SUPERIOR COURT
)
)SS:
COUNTY OF MARION) CAUSE NO.

TIMOTHY BYNUM

Plaintiff,

VS.

REMY INC.,)
REMY INTERNATIONAL, INC., and)
REMY INTERNATIONAL HOLDINGS,)
INC.,)
GENERAL MOTORS CORPORATION,)
DELPHI AUTOMOTIVE SYSTEMS)
HOLDING, INC.,)
DELPHI AUTOMOTIVE SYSTEMS, LLC,)
and)
ADAMO DEMOLITION COMPANY,)

Defendants,

49D12 08 09 CT 0 4 3 6 7 **3**

FILED

115

SEP 25 2008

Elizabeth A. White
CLERK OF THE MARION CIRCUIT COURT

COMPLAINT FOR DAMAGES

Comes now the Plaintiff, by counsel, and for his cause of action against the Defendants,
each of them, states as follows:

1. At all times hereinafter mentioned Defendants Remy Inc., Remy International Inc., Remy International Holdings, Inc., General Motors Corporation, Delphi Automotive Systems Holding, Inc., and Delphi Automotive Systems, LLC owned, operated and maintained a factory known as Plant 11 in Anderson, Indiana.
2. Between September 25th and September 28th, 2006 Defendant Adamo Demolition Company was providing services at Plant 11 to shut down the Plant.
3. At said time and place, Tim Bynum was working as an employee of an independent contractor, when he was subjected to a toxic exposure.

EXHIBIT B

IN THE CIRCUIT COURT
THIRD JUDICIAL CIRCUIT
MADISON COUNTY, ILLINOIS

FILED

AUG 18 2008

CLERK OF CIRCUIT COURT #6
THIRD JUDICIAL CIRCUIT
MADISON COUNTY, ILLINOIS

WILLIAM CAWLFIELD,

Plaintiff,

-vs.-

08-L-82

A.W. CHESTERTON, INC.,
AGCO CORPORATION,
ALLIED MANUFACTURING COMPANY,
AMPEX CORPORATION,
ARVINMERITOR INC.,
BONDEX INTERNATIONAL INC.,
BRAND INSULATIONS INC.,
BORG-WARNER CORPORATION, by its successor-in-interest,
BORGWARNER MORSE TEC INC.,
CBS CORPORATION, a Delaware corporation, f/k/a
VIACOM INC., successor by merger to CBS CORPORATION,
a Pennsylvania corporation, f/k/a
WESTINGHOUSE ELECTRIC CORPORATION,
CERTAIN-TEED CORPORATION,
CHRYSLER LLC,
CLEAVER-BROOKS COMPANY INC.,
COOPER INDUSTRIES, INC.,
CROWN CORK & SEAL COMPANY, INC.,
DEERE & COMPANY,
DELCO REMY INTERNATIONAL INC.,
DOMCO PRODUCTS TEXAS, L.P.,
EMERSON RADIO CORP.,
EVRAZ OREGON STEEL MILLS,
FORD MOTOR COMPANY,
FOSTER WHEELER ENERGY CORP.,
GARLOCK INC.,
GENERAL ELECTRIC COMPANY,
GENERAL GASKET CORPORATION,
GENERAL MOTORS CORPORATION,
GENERAL REFRACTORIES COMPANY,
GEORGIA-PACIFIC CORPORATION,
GOODYEAR TIRE AND RUBBER COMPANY,
GRIMES AEROSPACE COMPANY, d/b/a
SURFACE COMBUSTION,
HONEYWELL INTERNATIONAL INC.,
INDUSTRIAL HOLDINGS CORPORATION, f/k/a
THE CARBORUNDUM COMPANY

INGERSOLL-RAND COMPANY,)
INTERNATIONAL PAPER COMPANY,)
INTERNATIONAL TRUCK & ENGINE CORPORATION,)
JOHN CRANE, INC.,)
JOHN DEERE COMPANY,)
KENTILE FLOORS, INC.)
LG ELECTRONICS U.S.A., INC.,)
MW CUSTOM PAPERS LLC,)
MAREMONT CORPORATION,)
MCKESSON CHEMICAL COMPANY,)
MCKESSON CORPORATION,)
METROPOLITAN LIFE INSURANCE COMPANY,)
MOTOROLA, INC.,)
OWENS-ILLINOIS, INC.,)
PHILIPS ELECTRONICS NORTH AMERICA CORPORATION,)
PNEUMO ABEX CORPORATION,)
RCA CORPORATION,)
RILEY STOKER CORPORATION,)
RPM INTERNATIONAL INC.,)
RPM INC.,)
SPRINKMANN SONS CORPORATION,)
SPRINKMANN SONS CORPORATION OF ILLINOIS,)
T.H. AGRICULTURE & NUTRITION, L.L.C. successor to)
THOMPSON HAYWARD CHEMICAL CO., INC.,)
TRANE US, INC.,)
WESTERN AUTO SUPPLY COMPANY,)
YOUNG GROUP LTD., f/k/a YOUNG SALES CORP.,)
YOUNG INSULATION GROUP OF ST. LOUIS, INC.,)
ZENITH ELECTRONICS LLC,)
Defendants,)

FIRST AMENDED COMPLAINT

COUNT I

(NEGLIGENCE COUNT)

Now comes the Plaintiff, by his attorneys, SIMMONSCOOPER LLC, and for his cause
of action against the Defendants, states:

1. The Plaintiff, William Cawlfild, is a resident of the State of Colorado.

EXHIBIT C

STATE OF INDIANA)
)
COUNTY OF MARION)

MARION COUNTY SUPERIOR COURT
CIVIL DIVISION ROOM NO. 2
CAUSE NO. 49D02-9801-MI-0001-127

Robert Phillips,

Plaintiff,

v.

A.E. Staley Manufacturing Co.
A W Chesterton Co.
Allis Chalmers Product Liability Trust
American Standard, Inc.
Asarco, Inc.
Asbestos Corp., Ltd.
Asphalt Materials, Inc.
Atlantic Richfield Co. successor in interest to
The Anaconda Co.
Atlas Turner, Inc.
Bayer Cropscience, LP, successor to
Amchem Products, Inc.
Bell Asbestos Mines, Ltd.
BMW Constructors, Inc.
BOC Group
Borg-Warner, Inc.
BP Corp. North America, Inc.
Brand Insulation, Inc.
Buffalo Pumps, Inc.
Bunge North America (East), Inc. f/k/a
Central Soya Co., Inc.
CertainTeed Corp.
Circle B Co.
Cleaver-Brooks, Inc.
Coca Cola Enterprises, Inc.
Copeland Corp.
Crompton Corp. successor in interest to
Witco Corp.
Crown Cork & Seal Co., Inc.
Daimler-Chrysler Corp.
Dana Corp.
DAP, Inc.
Delco Electronics LLC
Durabla Manufacturing Co.
F.A. Wilhelm Construction Co., Inc

FILED

SEP 01 2004

Doris Ann Sheller
CLERK OF THE
MARION CIRCUIT COURT

Fargo Insulation, Inc.)
Ford Motor Co.)
Foster Wheeler, LLC)
Freyr Brothers, Inc.)
G.W. Berkheimer Co., Inc.)
Garlock, Inc.)
General Motors Corp.)
Golden Casting Corp.)
Grace Foods, Inc.)
Hagerman Construction Corp.)
Hedman Resources, Ltd.)
Henry Co.)
Hormel Foods Corp.)
Hunt Construction Group, Inc.)
Indiana Bell Telephone Co., Inc.)
Indianapolis Power & Light Co. (IPL))
INDOPCO, Inc. f/k/a National Starch & Chemical Corp.)
International Paper Co.)
International Truck and Engine Corp.)
Kennedy Tank & Manufacturing)
Lucent Technologies, Inc. successor in interest to Western Electric)
Marathon Oil Co.)
McMaster-Carr Supply Co.)
Metropolitan Life Insurance Co.)
Millennium Petrochemicals, Inc. successor in interest to Bridgeport Brass)
Minnesota Mining & Manufacturing Co.)
Norton Co. n/k/a St-Gobain Abrasives, Inc.)
Oakfabco, Inc., f/k/a Kewanee Boiler Corp.)
Otis Elevator Co.)
Owens-Illinois, Inc.)
Praxair Surgface Technologies, Inc.)
Prox Co., Inc.)
PSI Energy, Inc.)
Quigley Co., Inc.)
Reilly Industries, Inc.)
Remy International, Inc.)
Riley Power, Inc., f/k/a Riley Stoker Corp.)
Rinker Materials Corp.)
Rogers Corp.)
SEPCO, Inc.)
Shambaugh & Son, LLC)

Sid Harvey)
Sprinkmann Sons Corp. of Illinois)
Steel Grip, Inc.)
Stokley-Van Camp, Inc.)
The Dow Chemical Co.)
The Great Atlantic & Pacific Tea Co.)
The Kroger Co.)
The Quaker Oats Co.)
The Sager Corp.)
Triangle Enterprises, Inc.)
Tyco International (U.S.), Inc. successor in)
interest to Ansul, Inc.)
Union Carbide Corp.)
Uniroyal, Inc.)
Viacom, Inc., successor in interest to)
Westinghouse Electric Corp.)
Weil McLain)
)
Defendants.)

AMENDED COMPLAINT FOR DAMAGES AND DEMAND FOR JURY TRIAL

Plaintiff **Robert Phillips**, by counsel, allege and incorporate as follows:

GENERAL ALLEGATIONS

1. Robert Phillips is the Plaintiff herein.
2. DEFENDANTS which PLAINTIFF alleges manufactured, sold, installed or caused to be installed, used, distributed, and/or otherwise placed into the stream of commerce, asbestos and/or asbestos-containing products to which PLAINTIFF Robert Phillips was exposed are as follows:

A W Chesterton Co; Allis Chalmers Products Liability Trust; American Standard, Inc; Asarco, Inc; Asbestos Corp., Ltd; Atlas Turner, Inc; Bayer Cropscience, LP, Successor to Amchem Products, Inc; BMW Constructors, Inc; Bell Asbestos Mines, Ltd; BOC Group; Brand Insulation, Inc; Buffalo Pumps, Inc; CertainTeed Corp; Circle B Co; Cleaver-Brooks, Inc; Copeland Corp; Crown Cork & Seal Co., Inc; Dana Corp; DAP, Inc; Durabla Manufacturing Co; F.A. Wilhelm Construction Co., Inc; Fargo Insulation, Inc; Foster Wheeler, LLC; Freyn Brothers, Inc; G.W. Berkheimer Co., Inc; Garlock, Inc; Hagerman Construction Corp; Hedman Resources, Ltd; Henry Co; Hunt Construction Group, Inc; International Paper Co. ; Kennedy Tank & Manufacturing; McMaster-Carr Supply Co; Metropolitan Life Insurance Co; Minnesota Mining & Manufacturing Co; Norton Co., n/k/a Saint-Gobain Abrasives, Inc; Oakfabco, Inc., f/k/a Kewanee Boiler Corp; Owens-

EXHIBIT D

IN THE SUPERIOR COURT
FOR THE COUNTY OF PROVIDENCE
STATE OF RHODE ISLAND

IN RE: ASBESTOS LITIGATION

MARY ANN WYDRA and ROBERT BINDA,
AS CO-INDEPENDENT EXECUTORS
OF THE ESTATE OF CLEMENT WYDRA and
MARY ANN WYDRA, INDIVIDUALLY

C.A. NO. PC-06-2153

VERSUS

JURY TRIAL DEMANDED

A.W. CHESTERTON COMPANY
BUFFALO PUMPS, INC.
CBS CORPORATION
Individually, and as Successor in
Interest to Westinghouse Electric Corp., and
as successor in interest to B.F. Sturtevant
COOPER-BESSEMER CORP.
D.C. FABRICATORS, INC.
individually and as successor in interest
to C.H. Wheeler Company
DELCO REMY INTERNATIONAL, INC.
ELLIOTT TURBOMACHINERY COMPANY, INC.
ENPRO INDUSTRIES, INC.
Individually and as Successor in Interest
to Fair Banks Morse Engine
GARDNER-DENVER, INC.
GARLOCK SEALING TECHNOLOGIES, LLC.
GENERAL ELECTRIC COMPANY

GENERAL MOTORS CORPORATION

IMO INDUSTRIES, INC.

INGERSOLL-RAND COMPANY

Individually and as Successor in

Interest to Terry Steam Turbine Company

JOHN CRANE, INC.

METROPOLITAN LIFE INSURANCE COMPANY

NEWPORT NEWS SHIPBUILDING, INC.

NEWPORT NEWS SHIPBUILDING AND

DRY DOCK CO.

NORTHERN PUMP COMPANY

PACKINGS AND INSULATION CORP.

P.I.C. CONTRACTORS, INC.

QUIMBY EQUIPMENT CO., INC

SCHUTTE & KOERTING, INC.

TERRY CORPORATION OF CONNECTICUT

UNION CARBIDE CORPORATION

VICKERS LTD.

WARREN PUMPS, INC.,

Individually and as Successor to the

Quimby Pump Company

WEINMAN PUMP AND SUPPLY COMPANY

WESTINGHOUSE AIR BRAKE COMPANY

WESTINGHOUSE ELECTRIC CORPORATION

COMPLAINT

1. Plaintiffs, Mary Ann Wydra and Robert Binda, individually and as Co-Independent Executors of the Estate of Clement Wydra ("Decedent") bring suit on behalf of the Estate of Clement Wydra and Mary Ann Wydra individually, for losses sustained as a result of her husband's injury and death.

2. The Federal Courts lack subject matter jurisdiction over this action, as there is no federal question and incomplete diversity of citizenship due to the presence of a Rhode Island defendant. Removal is improper. Every claim arising under the Constitution, treaties, or laws of the United States is expressly disclaimed (including any claim arising from an act or omission on a federal enclave, or of any federal officer of the U.S. or any agency or person acting under him occurring under color of such office). No claim of admiralty or maritime law is raised. Plaintiffs sue no foreign state or agency. Venue is proper in this court.

3. Each of the defendants named in the caption above has conducted business in the State of Rhode Island and has produced, manufactured or distributed asbestos and/or asbestos containing products with the reasonable expectation that such products would be used or consumed in this State, which products were so used or consumed, and has committed the tortious acts set forth below in this state.

EXHIBIT E

IN THE CIRCUIT COURT
THIRD JUDICIAL CIRCUIT
MADISON COUNTY, ILLINOIS

JAMES NANGLE,

Plaintiff,

-vs.-

A.W. CHESTERTON, INC.,
A.O. SMITH CORPORATION,
ASHLAND INC.,
BEAZER EAST INC.,
BONDEX INTERNATIONAL INC.,
BRAND INSULATIONS INC.,
BORG-WARNER CORPORATION, by its successor-in-interest,
BORGWARNER MORSE TEC INC.,
CBS CORPORATION, a Delaware corporation, f/k/a
VIACOM INC., successor by merger to CBS CORPORATION,
a Pennsylvania corporation, f/k/a
WESTINGHOUSE ELECTRIC CORPORATION,
CERTAIN-TEED CORPORATION,
CLEAVER-BROOKS COMPANY INC.,
COOPER INDUSTRIES, INC.,
CRANE CO.,
CROWN CORK & SEAL COMPANY, INC.,
DUPONT CHEMICAL COMPANY,
FORD MOTOR COMPANY,
FOSECO INC.,
FOSTER WHEELER ENERGY CORP.,
GARLOCK INC.,
GARLOCK SEALING TECHNOLOGIES LLC,
GENERAL ELECTRIC COMPANY,
GENUINE PARTS COMPANY,
GEORGIA-PACIFIC LLC,
GRIMES AEROSPACE COMPANY, d/b/a
SURFACE COMBUSTION,
HERCULES POWDER COMPANY,
HONEYWELL INTERNATIONAL INC.,
IMO INDUSTRIES INC.,
INDUSTRIAL HOLDINGS CORPORATION, f/k/a
THE CARBORUNDUM COMPANY
INGERSOLL-RAND COMPANY,
JOHN CRANE, INC.,

NO. 09-L-574

FILED

JUN 08 2009

CLERK OF CIRCUIT COURT #10
THIRD JUDICIAL CIRCUIT
MADISON COUNTY, ILLINOIS

KENTILE FLOORS, INC.)
MAREMONT CORPORATION,)
MCKESSON CHEMICAL COMPANY,)
MCKESSON CORPORATION,)
METROPOLITAN LIFE INSURANCE COMPANY,)
MW CUSTOM PAPERS LLC,)
OCCIDENTAL CHEMICAL CORPORATION,)
ON MARINE SERVICES COMPANY, A WHOLLY OWNED)
SUBSIDIARY OF OGLEBAY NORTON COMPANY,)
OWENS-ILLINOIS, INC.,)
PNEUMO ABEX LLC, successor-in-interest to ABEX)
CORPORATION, f/k/a PNEUMO ABEX CORPORATION,)
REMY INTERNATIONAL INC.,)
RILEY STOKER CORPORATION,)
RPM INTERNATIONAL INC.,)
RPM INC.,)
SEPCO CORPORATION,)
SPRINKMANN INSULATION, INC.,)
SPRINKMANN SONS CORPORATION,)
SPRINKMANN SONS CORPORATION OF ILLINOIS,)
TAMKO BUILDING PRODUCTS INC.,)
TRANE US, INC.,)
TRIANGLE CONDUIT & CABLE CO. INC.,)
WYETH (INC.),)
YOUNG GROUP LTD., f/k/a YOUNG SALES CORP.,)
YOUNG INSULATION GROUP OF ST. LOUIS, INC.,)
Defendants,)

FIRST AMENDED COMPLAINT

COUNT I

(NEGLIGENCE COUNT)

Now comes the Plaintiff, by his attorneys, SIMMONSCOOPER LLC, and for his
cause of action against the Defendants, states:

1. The Plaintiff, James Nangle, is a resident of the State of Florida.